



Richmond L. Williams
Chief Counsel, Environmental Litigation

Ashland Inc.

500 Hercules Road
Bldg. 8139, Room 226
Wilmington, DE 19808
Tel: 302-594-7020, Fax 302-654-7554
rlwilliams@ashland.com

April 4, 2013

VIA FEDERAL EXPRESS

 **ORIGINAL**

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: USEPA's 104(e) Request for Information - Safety Light Corporation Superfund Site

Dear Mr. Steinmetz:

The following is submitted on behalf of Ashland Inc. ("Ashland") in response to the 104(e) Request for Information ("RFI") from the United States Environmental Protection Agency, Region III ("EPA") directed to Ashland regarding the Safety Light Corporation Superfund Site (the "Site").

Ashland understands the RFI is intended to seek information and documents for the period 1945 to the present regarding any business relationship(s) Ashland may have had with the Site and its predecessor or affiliated companies identified in the RFI. In 1997, Ashland formalized its corporate Records Management Policy (ASH00001 – ASH00004) to maintain a system to ensure the proper maintenance and disposition of its records and documents. Records are retained as long as required for (a) business operations or archival purposes, or (b) to satisfy legal or regulatory obligations, as reflected in the Records Management Master Schedule. Once the retention period for a record has expired, the record is disposed of. The retention period for most possible records sought by EPA have long since expired with respect to records generated or received over the past sixty-eight (68) years.

Additionally, Ashland is a diversified business entity, including various divisions, subsidiaries and affiliates, and entities acquired through various corporate acquisitions ("Ashland Entities"). The RFI does not limit a search of Ashland Entities to a geographic location over the sixty-eight (68) year time span that would permit Ashland to conduct a reasonable search to identify any business transactions with the Site and its predecessor or affiliated companies.

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

Subject to both the general and specific objections noted below, and without waiving any rights, defenses and/or privileges that may be available to Ashland at law and/or equity, Ashland submits the following responses and states that as of this date, after a diligent search and review of Ashland's records known to exist at this time and consulting with current and former employees, it has not located any information or records regarding Ashland's business relationship(s) with the Site and its predecessor or affiliated companies identified in the RFI.

USEPA provided Ashland with several documents obtained from the Site that purportedly suggest a business arrangement existed between U.S. Radium Corp., the Site's affiliate, and Drew Chemical Corporation, a company that was acquired by Ashland ("Drew") (see, ASH00005 – ASH00011). Ashland has reviewed these documents. The information contained in the documents EPA provided do not establish a business relationship between Ashland and the Site and/or give rise to CERCLA liability 42 U.S.C. Section 9607(a).

ASH00005 – ASH0007 are purchase orders from 1966 issued by Drew to U.S. Radium Corporation in Morristown, NJ for the purchase of radium strips that are accessories for Barber Colman gas chromatography ionization detectors. ASH00008 – ASH00010 are purchase orders from 1966 and contain charges relating to disposal of radioactive material, however they neither show a nexus to the Site nor that actual disposal occurred. ASH00011 is an unreadable data sheet.

In 1966, Drew's operations at the Boonton location involved a chemical business (the processing, blending and repackaging of marine chemicals, fuel oil treatment compounds, tank cleaning compounds, water treatment chemicals, defoamers for the pulp and paper industry, biocides) and a vegetable oils business. In 1981, Ashland acquired U.S. Filter Corp. who owned the stock of Drew. However, the assets of Drew's vegetable oil business had previously been acquired by Pacific Vegetable Oil Company in 1970. Ashland is not a successor-in-interest to Pacific Vegetable Oil.

These records do not contain information that would allow a reader to determine if ASH00005 – ASH00011 are subject of the operation of Drew's chemical or vegetable oil business. Accordingly, EPA has not established a nexus between the Drew chemical business (acquired by Ashland) and the Site. Further, ASH00005 – ASH00007 do not establish CERCLA liability under 42 U.S.C. Section 9607(a) as they show the sale of goods by U.S. Radium to Drew.

Ashland reserves its rights to continue its review and to supplement, modify, and/or amend its responses should additional information become available as a result of further investigation.

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

General Objections

Ashland asserts the following general objections to the RFI and reserves all rights, defenses, privileges and protections with respect to its responses to the RFI. Ashland incorporates by reference the foregoing general objections into each of its responses to the individual information requests to the extent applicable, and will therefore not restate such objections within all individual responses.

1. Ashland objects to the RFI to the extent that it seeks information that is not in Ashland's possession, custody or control. Subject to this objection, Ashland has reviewed information currently available to Ashland and relevant to the RFI. Ashland expressly states that its response to the RFI is limited by the current availability of information, and reserves the right to supplement, modify and/or amend its response if new or additional information becomes available.
2. Ashland objects to the RFI to the extent documents and/or information requested seek attorney/client communications, work product or any other documents or information protected from disclosure pursuant to any applicable privilege. Ashland specifically reserves all rights to assert legally recognized privileges to protect against the disclosure of information including, without limitation, the attorney-client privilege and the protection from disclosure pursuant to the work product doctrine. Ashland does not waive any such right or privilege by its response to the RFI, and hereby specifically asserts such privileges and protections as applicable. The inadvertent disclosure of privileged documents, or disclosure of documents labeled as privileged but initially deemed to be mislabeled, shall not waive any applicable privilege available to Ashland.
3. Ashland objects to any requirement to produce documents or information already in the possession of USEPA, Region III, or of another government agency or is otherwise already in the public domain.
4. Based upon its review of the RFI, Ashland regards individual components of the RFI as vague or ambiguous. By way of example only, RFI is vague or ambiguous to the extent that it does not define various terms or purports to define terms other than by their commonly understood meaning. Ashland specifically states that it has provided responses to the RFI based upon its understanding of the requests and the common usage of specific terms not otherwise defined.

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

5. Ashland further objects to the RFI to the extent that any individual request is overly broad and/or that responding thereto would be unduly burdensome. In this respect, Ashland specifically objects to the RFI in that it purports to require information for a period of time spanning sixty-eight (68) years (1945 to the present) involving hundreds of Ashland business entities throughout the United States when the only company identified by USEPA's documents is Drew.
6. Ashland objects to the RFI's definition of "documents" to the extent it extends to documents not in Ashland's possession, custody, or control. Ashland disclaims any responsibility to search for, locate, and provide EPA copies of any documents not in Ashland's possession, custody, or control.
7. Ashland objects to the extent that the RFI, including the "Instructions" contained therein, purports to impose on Ashland's obligations beyond those established under the authority of Section 104(e). Authority under Section 104(e) authorizes USEPA to seek information relating to the following: (A) the identity, nature and quantity of materials that may have been treated, stored, or disposed of at a vessel or facility or transported to a vessel or facility, (B) the nature and extent of a release or threatened release or a hazardous substance or pollutant or contaminant at or from a vessel or facility and (C) information relating to the ability of a person to pay for or to perform a cleanup.
8. Ashland objects to the definition of "you," "yours" and "Respondent" because the terms are overbroad and it is not possible for Ashland to answer questions on behalf of all the persons and entities identified therein.
9. Nothing in this response is intended to waive, restrict or otherwise impair any arguments or defenses to CERCLA liability or otherwise, and Ashland hereby expressly preserves its right and ability to raise any and all such arguments and defenses.

USEPA's Questions and Ashland's Responses

1. Describe in detail any and all business relationship(s) between Ashland and Safety Light or its affiliates i.e., Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated, as defined above.

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

Response:

In addition to the General Objections set forth above, Ashland objects to Question No. 1 on the basis that it is overbroad and unduly burdensome as it seeks information covering a sixty-eight (68) year time span (1945 to the present) and seeks information and records of potentially hundreds of Ashland business operations throughout the United States during that time period when the only company identified by USEPA's documents is Drew.

Subject to and without any waiver of its objections, Ashland states that as of this date, after a diligent search and review of Ashland's records known to exist at this time and consulting with current and former employees, it has not located any information or records establishing a business relationship between Ashland and Safety Light or its affiliates i.e., Safety Light Corporation, U.S. Radium Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated.

USEPA provided Ashland with several documents obtained from the Site that purportedly suggest a business arrangement existed between U.S. Radium Corp., the Site's affiliate, and Drew Chemical Corporation, a company that was acquired by Ashland ("Drew") (see, ASH00005 – ASH000011). Ashland has reviewed these documents. The information contained in the documents EPA provided do not establish a business relationship between Ashland and the Site and/or give rise to CERCLA liability 42 U.S.C. Section 9607(a).

ASH00005 – ASH00007 are purchase orders from 1966 issued by Drew to U.S. Radium Corporation in Morristown, NJ for the purchase of radium strips that are accessories for Barber Colman gas chromatography ionization detectors. ASH00008 – ASH00010 are purchase orders from 1966 and contain charges relating to disposal of radioactive material, however they neither show a nexus to the site nor that actual disposal occurred. ASH00011 is an unreadable data sheet.

In 1966, Drew's operations at the Boonton location involved a chemical business (the processing, blending and repackaging of marine chemicals, fuel oil treatment compounds, tank cleaning compounds, water treatment chemicals, defoamers for the pulp and paper industry, biocides) and a vegetable oils business. In 1981, Ashland acquired U.S. Filter Corp. who owned the stock of Drew. However, the assets of Drew's vegetable oil business had previously been acquired by Pacific Vegetable Oil Company in 1970. Ashland is not a successor-in-interest to Pacific Vegetable Oil.

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

These records do not contain information that would allow a reader to determine if ASH00005 – ASH00011 are subject of the operation of Drew's chemical or vegetable oil business. Accordingly, EPA has not established a nexus between the Drew chemical business (acquired by Ashland) and the Site. Further, ASH00005 – ASH00007 do not establish CERCLA liability under 42 U.S.C. Section 9607(a) as they show the sale of goods by U.S. Radium to Drew.

2. Did Ashland ever send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to the Site?

Response:

See Ashland's response to Question No. 1.

3. Did Ashland ever send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated?

Response:

See Ashland's response to Question No. 1.

4. If you answered "yes" to Question 2 or Question 3, please respond to the following:
- a. Provide the time period during which each such transaction occurred.

Response:

NA.

- b. Provide the purpose or reason for each such transaction.

Response:

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

NA.

c. For each and every transaction, provide:

- i. the entity to which you sent radioactive materials or items containing radionuclides (i.e., Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal

Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated);

Response:

NA.

- ii. a detailed description of each radioactive material or item or type of item(s) sent and the amount of radionuclides contained within each such material or item(s);

Response:

NA.

- ii. the method used to send or transport such radioactive materials or items to the Site (e.g., hauler, U.S. mail, etc.);
iii.

Response:

NA.

- iv. the date(s) of the pickup and delivery of radioactive material or item(s) containing radionuclides;

Response:

NA.

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

- v. all documents relating to the transaction, including but not limited to invoices, and correspondence regarding the type, amount and transportation/disposal of the radioactive material or item(s) containing radionuclides to the Site; and

Response:

NA.

- vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other persons or parties that have documentation or information pertaining to the transportation/disposal of radioactive material or item(s) containing radionuclides to the Site, and/or to the entities identified in Question 3.

Response:

NA.

- d. If you response to the above includes the contracting of a hauler or transporter to transport and/or dispose of radioactive material or item(s) containing radionuclides, explain these arrangements and provide all documentation relating to those transactions. In addition, please identify:

- i. the persons with whom you, or other such persons, made such arrangements;

Response:

NA.

- ii. every date on which such arrangements took place;

Response:

NA.

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

- iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (e.g., liquid, solid), and the process for which the substance was used or the process that generated the substance;

Response:

NA.

- iv. the persons who selected the Site as the place at which materials were disposed or treated; and

Response:

NA.

- v. the names of employees, officers, owners, and agents for each transporter.

Response:

NA.

- e. For each and every instance in which you/your company arranged for radioactive material to the Site, identify;

- i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you;

Response:

NA.

- ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, and/or ship materials to the Site; and

Response:

NA.

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

- iii. the names, titles, and areas of responsibility of any persons, including all Ashland employees, present and former, who were involved in or would have knowledge of such arrangements.

Response:

NA.

- f. Describe any permits or applications and any correspondence between Ashland and any regulatory agencies regarding materials transported to or disposed of at the Site.

Response:

NA.

- g. Provide copies of any correspondence between Ashland and any third party regarding materials transported to or disposed of at the Site.

Response:

NA.

- h. Provide the identify of, and copies of nay documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.

Response:

NA.

- i. Provide the identities of any and all of your predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

Response:

NA.

5. Did Ashland ever generate other waste(s), not described in response to Questions 2 or 3, above, that were disposed of or reclaimed by Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated

Response:

In addition to the General Objections set forth above, Ashland objects to Question No. 5 on the basis that it is overbroad and unduly burdensome because it covers a time span of sixty-eight (68) years (1945 to the present) and seeks information and records for hundreds of Ashland business entities throughout the United States during that time period when the only company identified by EPA's documents is Drew.

Subject to and without any waiver of its objections, Ashland states that as of this date, after a diligent search and review of Ashland's records known to exist at this time, and consulting with current and former employees, it has not located any information or records that Ashland ever generated other waste(s), not described in response to Questions 2 or 3, above, that were disposed of or reclaimed by Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated.

6. For each question above, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

Response:

Beth Moore, Senior Purchasing Specialist, Ashland Inc
Kristi Hames, Industrial Hygiene Project Manager, Ashland Inc.
Tom Keenan, Chemist, Ashland Inc.
Dave Miller, former Radiation Specialist Officer, Ashland Inc.

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

Joseph French, Senior Counsel, Ashland Inc., Law Department
Kim Czir, Director, Corporate Real Estate Department, Ashland Inc.
Christin Grubaugh, SAP Master Data Manager, Ashland Inc.
Steven Prescott, Research Center, Ashland Inc.
Greg Hays, former Sales Manager, Drew Chemical Corporation
Bill Dondarski, former Plant Manager, Drew Chemical Corporation
Robert Mihok, former Facilities Manager, Drew Chemical Corporation

The above individuals may be contacted through Richmond L. Williams, Chief Counsel – Environmental Litigation, Ashland Inc., 500 Hercules Road, Bldg. 8139, Room 226, Wilmington, DE 19808, 302.594.7010.

7. If you have reason to believe there may be persons able to provide more detailed or complete response to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

Response:

In addition to the General Objections set forth above, Ashland objects to Question No. 7 on the basis that it is overbroad and unduly burdensome because it covers a time span of sixty-eight (68) years (1945 to the present) and seeks information and records for hundreds of Ashland business entities throughout the United States during that time period when the only company identified by USEPA's documents is Drew.

Subject to and without any waiver of its objections, Ashland states that beginning in 1981 its former Ashland Distribution Environmental Services business ("ES") partnered with vendors throughout the U.S. to properly treat and dispose of waste from Ashland's business operations throughout the United States. On March 31, 2011, Ashland closed the sale of its global distribution business, known as Ashland Distribution, to Nexeo Solutions, LLC, an affiliate of TPG Capital ("Nexeo") and all ES records were transferred to Nexeo. Ashland suggests that USEPA contact Nexeo who could possibly have responsive information and documents. Nexeo's contact is:

Michael B. Farnell, Jr.
Chief Legal Officer
Nexeo Solutions, LLC
9303 New Trails Drive
Suite 400
The Woodlands, TX 77381

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

Additionally, Ashland understands that all radioactive sources must be registered, handled, and disposed of in accordance with all applicable local, state, and federal regulations. Ashland suggests that USEPA seek information regarding entities that conducted business with the Site and its predecessor or affiliated companies identified in the RFI from the respective regulating agencies (e.g., Atomic Energy Commission and Nuclear Regulatory Commission, and state regulating authorities).

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

Response:

In addition to the General Objections set forth above, Ashland objects to Question No. 8 on the basis that it is overbroad and unduly burdensome because it covers a time span of sixty-eight (68) years (1945 to the present) and seeks information and records for hundreds of Ashland business entities throughout the United States during that time period when the only company identified by USEPA's documents is Drew.

Subject to and without any waiver of its objections, Ashland states that at this time, it has no information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site.

9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing provide us with the following;
 - a. Your document retention policy;

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

Response:

In addition to the General Objections set forth above, Ashland objects to Question No. 9 on the basis that it is overbroad and unduly burdensome because it covers a time span of sixty-eight (68) years (1945 to the present) and involves hundreds of Ashland business entities throughout the United States during that time period when the only company identified by USEPA's documents is Drew.

Further, in 1997, Ashland formalized its corporate Records Management Policy (ASH00001 – ASH00004) to maintain a system to ensure the proper maintenance and disposition of its records and documents. Records are retained as long as required for (a) business operations or archival purposes, or (b) to satisfy legal or regulatory obligations, as reflected in the Records Management Master Schedule. Once the retention period for a record has expired, the record is disposed of. The retention period for most possible records sought by EPA have long since expired with respect to documents generated or received over the past sixty-eight (68) years

Subject to and without any waiver of its objections, and without any waiver of its objections, Ashland states that as of this date, after a diligent search and review of Ashland's records known to exist at this time and consulting with current and former employees, it has not located any information or records establishing a business relationship between Ashland and Safety Light or its affiliates i.e., Safety Light Corporation, U.S. Radium Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated

- b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;

Response:

See Ashland response to Question No. 9 (a).

- c. A description of the type of information that would have been contained in the documents; and

Response:

See Ashland response to Question No. 9 (a).

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
RE: Safety Light Corporation Superfund Site
April 4, 2013

- d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for

the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Response:

See Ashland's response to Question No. 9 (a).

In replying to this RFI, Ashland has not, and shall not be deemed to have admitted any liability or responsibility with respect to the Site, the subject matter of the RFI or any other matter. If you have any questions concerning any response herein, please contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. L. Williams", with a horizontal line extending from the end of the signature.

Richmond L. Williams

Enclosures



MAY 26 1966 PURCHASE ORDER
DREW CHEMICAL CORPORATION
416 DIVISION STREET
BOONTON, N. J.
Phone (201) DE 4-2900

ORDER NO. G 6685

SHIP TO: ☒ BOONTON, N. J.
(DELIVERIES ACCEPTED 7:30 A.M. TO 3:00 P.M.)

☐ BL 065092 MAY 26

VENDOR: U. S. RADIUM CORP.
BOX 246
MORRISTOWN, N. J.

IMPORTANT: ALL TERMS AND CONDITIONS ON THE FACE HEREOF AND REVERSE SIDE HEREOF ARE A PART OF THIS CONTRACT. READ THEM. NO SUBSTITUTION OR CHANGES SHALL BE MADE WITHOUT WRITTEN APPROVAL OF DREW CHEMICAL CORPORATION.
NOTE: THE FOLLOWING CLAUSE MUST APPEAR ON ALL INVOICES:
"MATERIALS OR WORK COVERED BY THIS INVOICE WERE PRODUCED IN CONFORMITY WITH THE FAIR LABOR STANDARDS ACT AS AMENDED."

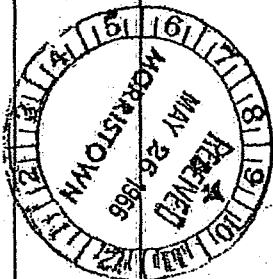
DATE MAY 25 1966

SHIP TO ARRIVE
ASAP
OTHERWISE NOTIFY US AT ONCE

IF ROUTING IS NOT SPECIFIED, SHIP BY CHEAPEST ROUTE COMMENSURATE WITH REQUIRED DELIVERY DATE. DO NOT INSURE PARCEL POST OR EXPRESS SHIPMENTS UNLESS SPECIFICALLY INSTRUCTED TO DO SO.

VIA: *Rails*
F.O.B.: BOONTON

(HEREIN CALLED CONTRACTOR)		TERMS: NET 30	F.O.B.: BOONTON	
ITEM	QUANTITY	MATERIAL	PRICE	UNIT OR PER
	2 PCS	RADIUM STRIPS (# LAB-204) RA 226, 56 MC, FOR BARBER COLMAN GC IONIZATION DETECTORS (A-4071) WITH NOTCH AND CURVED SHAPE 15 X 58 M/M FOR M-10 GC OPERATION <i>same as earlier supplied</i> <i>Lab 650</i> <i>1-2</i> <i>ship approx 1 wk</i>	<i>30.00</i>	EA <i>FOB destination</i>



(4/3)

IMPORTANT: EACH SHIPMENT MUST BE ACCOMPANIED BY A PACKING SHEET INDICATING:

1. OUR PURCHASE ORDER NO.
2. ITEM NO.
3. COMPLETE DESCRIPTION

IN MULTIPLE PACKAGE SHIPMENTS CLEARLY DESIGNATE PACKAGE IN WHICH PACKING SHEET IS ENCLOSED.

DIRECT ALL INQUIRIES TO BUYER

T. J. THOMAS
DREW CHEMICAL CORPORATION
(HEREIN CALLED DCC)

F. G. SCHMITT
PURCHASING AGENT

MAIL INVOICE IN DUPLICATE TO 416 DIVISION ST. BOONTON, N. J.

SL000366

ASH00005

MORRISTOWN, NEW JERSEY

Owen Chemical Corporation
476 Division Street
Boonton, New Jersey

5-25-66

SHIPPED DATE

WFOICE 00.

Deonton, New Jersey

1

BL 065092

Shipping via

PACKING SLIP NO

CUSTOMER ORDER NO.	TOP FOOT	CUSTOMER NUMBER	SALESMAN	CASH	EX	MIL. & VED.	COMPLET	ROYALTY	OTHER SP.
6 0005	X	17	83	1-2					

ROYAL

Delivery;
6/3/66

T. J. THOMAS

AFC License
Approval #
Total MC

684 49 361

5. PLANT MANAGER ORDER COPY

SL000364

ASH00006

PLANT:
BLOOMSBURG, PA.
717-284-3810
TWX-USA-61-62-717-284-2447

UNITED STATES RADIUM CORPORATION
MORRISTOWN, NEW JERSEY

SOLD
TO

Drew Chemical Corporation
416 Division Street
Boonton, New Jersey

SHIP
TO

Boonton, New Jersey

ORDER DATE

5-25-66

INVOICE DATE

5-24-66

No. 8662

SHIPPED DATE

5-31-66

INVOICE NO.

8662

SHIPMENT NO.

1

DUPLICATE NO.

BL 063052

SHIPPED VIA

Train

PACKING SLIP

113430

10-22-61

TERMS: NET 30 DAYS

CUSTOMER ORDER NO.		FOR. EX. TAX	CUSTOMER NUMBER	SALES TAX	CLAY	TAX	MIL. EX. TAX	AD. SALES TAX	AUTOMATIC	OTHER SPECIFY
# 6665		1		1	1	1				
QUANTITY ORDERED	DESCRIPTION OF MATERIAL					U.S. RADIUM (GMS. WT.)	UNIT PRICE	BALANCE ON ORDER	QUANTITY SHIPPED	AMOUNT
2	pos. Radium Strips (Lab -204) Ra 226 56 MG for Barber Colman Co Ionization detectors (A-4072) with notch and curved phage 15 x 50 MM						30.00 each	0	2	60.00
1	For M-10 00 operation									
1	Same as earlier supplied									
EXEMPT COMMISSION		DOLLARS		#1	#2	#3	7			

EXEMPT COMMISSION	DOLLARS	#1	#2	#3	TOTAL
					60.00

E. ACCOUNTING INVOICE COPY
FORM NO. 20-15

THIS IS TO CERTIFY THAT THE MERCHANDISE LISTED IN THIS INVOICE HAS BEEN PRODUCED IN
ACCORDANCE WITH THE FAIR LABOR STANDARDS ACT OF 1937 AS AMENDED.

DEPT. NO. 9

SL000363

ASH00007



PURCHASE ORDER
DREW CHEMICAL CORPORATION

416 DIVISION STREET
BOONTON, N. J.

Phone (201) DE 4-2900

ORDER NO. **G 8473**

DEC 14 1966

SHIP TO: ☒ BOONTON, N. J.
(DELIVERIES ACCEPTED 7:30 A.M. TO 3:00 P.M.)

BL 065653 DEC14

VENDOR: **U. S. RADIUM CORP.**
P.O. BOX 246
Morristown, New Jersey

IMPORTANT: ALL TERMS AND CONDITIONS ON THE FACE HEREOF AND REVERSE SIDE HEREOF ARE A PART OF THIS CONTRACT. READ THEM. NO SUBSTITUTION OR CHANGES SHALL BE MADE WITHOUT WRITTEN APPROVAL OF DREW CHEMICAL CORPORATION.
NOTE: THE FOLLOWING CLAUSE MUST APPEAR ON ALL INVOICES:
"MATERIALS OF WORK COVERED BY THIS INVOICE WERE PRODUCED IN CONFORMITY WITH THE FAIR LABOR STANDARDS ACT AS AMENDED."

DATE **December 12, 1966**

SHIP TO ARRIVE
ASAP
OTHERWISE NOTIFY US AT ONCE

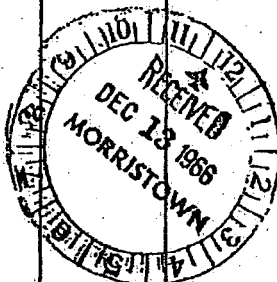
IF ROUTING IS NOT SPECIFIED, SHIP BY CHEAPEST ROUTE COMMENSURATE WITH REQUIRED DELIVERY DATE. DO NOT INSURE PARCEL POST OR EXPRESS SHIPMENTS UNLESS SPECIFICALLY INSTRUCTED TO DO SO.

VIA: *F.P. Blomberg*
F.O.B.: **Boonton, N.J.**

(HEREIN CALLED CONTRACTOR)

TERMS: **Net 30**

ITEM	QUANTITY	MATERIAL	PRICE	UNIT OR PER
		(TO COVER DISPOSAL SERVICE OF RADIOACTIVE MATERIAL)		
		(IN DETAIL: 21 pcs. Ra 226 STRIPS, USED IN BARBER COLMAN 10-M GC detector cells. @ 58.00/pc)	\$30.00	ASAP
		THIS MUST BE DONE ACCORDING TO THE NEW JERSEY STATE RADIATION PROTECTION CODE (CHAPTERS 4.6 and 13.5)		
		CONTACT J. BARANDY, RADIATION OFFICER TO MAKE ARRANGEMENTS.		
		<i>Radium content per pc approx 15mc</i>		<i>Job 63</i>
		<i>send container, labels, pkg. instructions, etc.</i>		<i>Order 12/15</i>
		<i>ship immed.</i>		<i>1-2</i>
				<i>Ship 12/16</i>



IMPORTANT: EACH SHIPMENT MUST BE ACCOMPANIED BY A PACKING SHEET INDICATING:
1. OUR PURCHASE ORDER NO.
2. ITEM NO.
3. COMPLETE DESCRIPTION
IN MULTIPLE PACKAGE SHIPMENTS CLEARLY DESIGNATE PACKAGE IN WHICH PACKING SHEET IS ENCLOSED.

DIRECT ALL INQUIRIES TO BUYER

T. J. THOMAS

DREW CHEMICAL CORPORATION
(HEREIN CALLED DCC)

F. G. SCHMITT

PURCHASING AGENT

MAIL INVOICE IN DUPLICATE TO 416 DIVISION ST. BOONTON, N. J.

SL000369

ASH000008

PLANT:
BLOOMSBURG, PA.
717-784-2810
TWN-1578-5120-717-784-2447

UNITED STATES RADFUM CORPORATION
MORRISTOWN, NEW JERSEY

Nº 15206

SOLD
TO

Erwin Chemical Corporation
426 Division Street
Econton, New Jersey

ORDER DATE

12-12-66

DELIVERY DATE

12-14-66

SHIPPED DATE

12-16-66

INVOICE NO.

15206

SHIPMENT NO.

1

OUR ORDER NO.

BL 065653

SHIPPED VIA

PPSH

PACKING SLIP NO.

121928

SHIP
TO

TERMS: NET 30 DAYS

CUSTOMER ORDER NO.	FOR X ROST	CUSTOMER NUMBER	SALESMAN	CLASS	TYPE	MILITARY	COMPLETE	ROYALTY	OTHER SPECIFY
G 8173			17	63	L-2				
QUANTITY ORDERED	DESCRIPTION OF MATERIAL	U.S. RADFUM JOB NO.	UNIT PRICE	BALANCE ON ORDER	QUANTITY SHIPPED	AMOUNT			
1	to cover diapycal service of radioactive material.		30.00	0	0	30.00			
2	In detail: 21 pcs. Ra 226 strips, used in Harbor Colman 10-M 60 detector coil & 56 mo/PC								
3	(Must be done acc. to New Jersey State Radiation production code (chapters 4.6 and 13.5)								
1						1.03			
EXEMPT COMMISSION		DOLLARS	#1	#2	#3	TOTAL			
						31.03			
E. ACCOUNTING INVOICE COPY		THIS IS TO CERTIFY THAT THE MERCHANDISE LISTED IN THIS INVOICE HAS BEEN PRODUCED IN ACCORDANCE WITH THE FAIR LABOR STANDARDS ACT OF 1937 AS AMENDED.				EST. DEPT. NO.			
FORM NO. 36-15						LAB 63			

SL000367

ASH00009

ASH00010

FILE NO 55999

Date:

U. S. RADIUM CORP.

Data Sheet of Radiosotope Sealed Sources

Customer _____ PO# _____ SO# _____
USRC or Cust. Dwg. # _____ No. Pcs. _____
Chemical Form _____ Activity Content _____
Required Shipping Date _____ Sealing Date _____
Phosphor _____

CONTAMINATION SURVEY

Type of measurement desired: (check)

Method of Leak Testing:

Swab (____)

Immersion (____)

Solvent used:

H₂O (____)

MEK (____)

Instrument used:

Nuclear Chicago (____)

Baird Atomic (____)

Internal _____ PCC10A, 1620 CRM

(#1620A, 1615B)

(#410)

External _____ G-H Tube, 1620 CRM

GM tube window thickness _____ 1.4 mg/cm²

FIRST LEAK TEST _____

FINAL LEAK TEST _____

Six month leak test to be performed by Cust. or returned to USRC.

RADIATION SURVEY

Type of measurement desired: (check)

Alpha (____); Beta (____); Gamma (____); Neutron (____)

Measurement from center of chamber:

(____ in.);

(____ Meter)

Instrument used:

Beckman MX4 (____)

Neutron (____)

End Fire _____

PCC Internal (____)

PCC External (____)

Radial Fire _____

2586 Nuclear Chicago (____)

Other _____

LIGHT MEASUREMENT

Type of measurement desired: (check)

Brightness (____)

Decay (____)

Instrument used:

USRC Photometer (____)

Other _____

Measurement readings on other side

SL000365

ASH00011

Records Management

Policy Statement

Ashland Inc., its commercial units and majority-owned or controlled subsidiaries ("Ashland") will maintain a system to ensure the proper maintenance and disposition of its documents and records.

Records will be retained only as long as required for (a) business operations or archival purposes, or (b) to satisfy legal or regulatory obligations, as reflected in the Records Management Master Schedule, after which time the Records will be promptly disposed of.

Overview

Information embodied in records is a vital and strategic asset. Ashland is the owner of all records created, received, and/or maintained by its employees in connection with business operations and other activities.

Records management is an important, necessary, and prudent business practice as well as a critical legal and regulatory compliance matter. A strong, effective, and viable Records Management Program can achieve many purposes, including the following:

- Protect Ashland's valuable records and information, whether in paper, electronic, or other forms or media;
- Enable Ashland to comply with applicable laws and regulations, including those related to records retention, data privacy, and other legal and regulatory requirements;
- Enable Ashland to respond to informational requests from courts, lawyers, regulators, shareholders, and others; and
- Improve employee productivity and shared learning through efficient information management.

Each employee must be familiar with and adhere to Ashland's Records Management Policy.

Benefits of Records Management

Ashland benefits from records management because it helps to:

- Meet applicable legal and regulatory standards;
 - Eliminate outdated and useless records;
 - Minimize the cost of records retention;
 - Increase efficiency of records retrieval; and
 - Optimize the use of electronic and physical storage space.
-

**Viability of
Storage Method**

Owners of Records must ensure their method of storage is usable for the entire Required Retention Period. Long term viability is an issue for all storage methods (e.g., fading of ink on hardcopy documents, brittleness of microfilm, CD rot, etc.); however this issue is of particular concern for electronic storage. Owners of Records stored electronically must ensure that the Records remain in a readable condition throughout the Required Retention Period and that technologies required to access the Records are maintained or the Records are converted to a method of storage that can be accessed.

**Records Hold
Obligations**

A hold order is issued at the direction of the Law Department with litigation, governmental investigation or proceeding, or audit has begun or is reasonably likely to begin. All records destruction is suspended insofar as it relates to either the subject matter of such litigation or governmental investigation or proceeding and/or the relevant records involved. All corporate records related to that matter must be maintained until further notice from the Law Department.

Employees are strictly prohibited from destroying, altering, or otherwise concealing records that may be subject to a hold order.

The Law Department will notify you when a hold order is in effect and will provide and special instructions regarding maintenance or transfer of relevant records. The hold order is applicable to all records in existence at the time the hold order is placed and to any subsequently created or received records relevant to the subject matter of the hold order.

When the litigation, governmental proceeding, or audit has concluded, all identified persons will be notified that the hold order has been withdrawn. All records that were the subject of the hold order will immediately revert to their normal retention periods. If the official retention time has expired, the records should be destroyed promptly.

Please be aware that the unauthorized or premature destruction of corporate records that are relevant to a hold order can subject Ashland and individual employee(s) to severe legal and disciplinary consequences, including criminal charges for obstruction of justice, civil penalties or spoliation of evidence, and termination of employment.

**Maintenance
and Application
of the Records
Management
Master
Schedule**

The Records Management Master Schedule identifies Ashland Corporate Records and their corresponding retention periods. All employees should become familiar with the Records Management Master Schedule. The Records Management Master Schedule will be updated in response to business related appeals or changed to laws or regulations.

It is the responsibility of employees to notify Records Management of additional record types that need to be added to the schedule and to remove types that are no longer relevant and should not be on the retention schedule. Records Management will also periodically survey employees to identify updates, additions, or deletions needed to the Records Management Master Schedule.

The retention periods shown on the Records Management Master Schedule for regulated records are generally based on United States federal laws. However, state, local, and other requirements for record keeping may be more stringent and must be followed.

Employees will adhere to the Records Management Master Schedule for all Records unless the Record is on hold. Specifically:

- Records will be retained for at least the period required by international, federal, state, and local laws governing the management of that type of Records;
- Records Management must approve any addition, deletion or revision to the Records Management Master Schedule ;
- Once a Record is finalized, drafts may not be retained;
- Copies of Records may not be retained longer than the longest Required Retention Period for the original Record; and
- When a matter or project contains Records subject to more than one Required Retention Period, the longest Required Retention Period must be used for that matter or project. The Required Retention Period is measured from when the Record ceases to be active or current.

All Records not specifically categorized on the Records Management Master Schedule are considered "Miscellaneous Records" and may be kept for any period up to but not exceeding two years at the discretion of management.

Third Party Storage

Whenever possible, Records should be sent to the Ashland Records Center in Russell, Kentucky for storage and disposal. If it is not feasible, a third party records center may be used. It is the responsibility of the Owners of Records to ensure that the third party provider complies with all of Ashland's Records Management policies and procedures, including but not limited to:

- Retaining Records in a facility offering security against unauthorized access;
- Protecting Records against natural or man-made disasters (e.g., earthquake, fire, etc.);
- Handling Records confidentially;
- Providing adequate access and prompt, efficient handling of Records;
- Disposing of Records in accordance with the Records Management Master Schedule; and
- Placing Records "on hold" when and as directed by Ashland.

Disposal of Records

Employees will use disposal methods appropriate to the information contained in the Record once its Required Retention Period has expired.

Employees will shred Records containing information covered by privacy laws or information that is considered confidential.

Definitions

Owners of Records – Owners of Records are responsible for maintaining the records to meet operating, legal and/or fiscal requirements. The owners must ensure their method of storage is usable for the entire Required Retention Period.

Record – Recorded information created within or received by Ashland that has been or is used in the accomplishment of work, and/or maintained as evidence, and information by Ashland in compliance with legal or regulatory obligations, or in the course of business. This information can either be an original or a copy, and may be in the form of a paper document, an electronic file on a hard drive or shared drive, or various other media types such as tape recordings, CDs, DVDs, or videos.

Records Management Master Schedule – A listing that identifies the types of Records held by Ashland and specifies the Required Retention Period for each Record.

Required Retention Period – The length of time that a Record must be retained for fiscal, historical, legal, operational, or other purposes before being destroyed unless destruction is suspended by Ashland's Law Department.

Responsible Party

Ashland's General Counsel is responsible for implementation of, and amendments to, this policy.

Scope

This policy applies to Ashland.

Effective Date

01 October 2009

From: (614) 790-3319
Mary Donahue
Ashland Inc.
5200 Blazer Parkway
Dublin, OH 43017

Origin ID: OSUA



Ship Date: 04APR13
ActWgt: 1.0 LB
CAD: 101272246/INET3370

Delivery Address Bar Code



SHIP TO: (614) 790-3319
Harry R. Steinmetz (3HS62)
US EPA Region III
1650 Arch Street

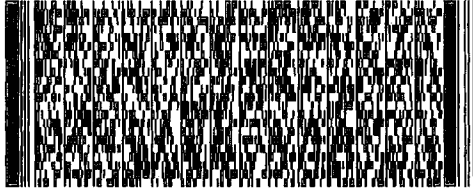
BILL SENDER

PHILADELPHIA, PA 19103

Ref #
Invoice #
PO #
Dept #

FRI - 05 APR 10:30A
PRIORITY OVERNIGHT

TRK# 7994 5032 7325
0201

**ZR REDA**

19103
PA-US
PHL



518G1/64EE/93AB

After printing this label:

1. Use the "Print" button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

From: (614) 790-3319
Mary Donahue
Ashland Inc.
5200 Blazer Parkway
Dublin, OH 43017

Origin ID: OSUA



Ship Date: 04APR13
ActWgt: 1.0 LB
CAD: 101272246/NET3370

Delivery Address Bar Code



SHIP TO: (614) 790-3319
Harry R. Steinmetz (3HS62)
US EPA Region III
1650 Arch Street

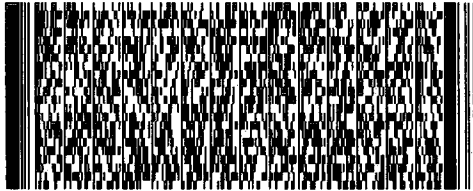
BILL SENDER

PHILADELPHIA, PA 19103

Ref #
Invoice #
PO #
Dept #

FRI - 05 APR 10:30A
PRIORITY OVERNIGHT

TRK# 7994 5032 7325
0201

**ZR REDA**

19103
PA-US
PHL



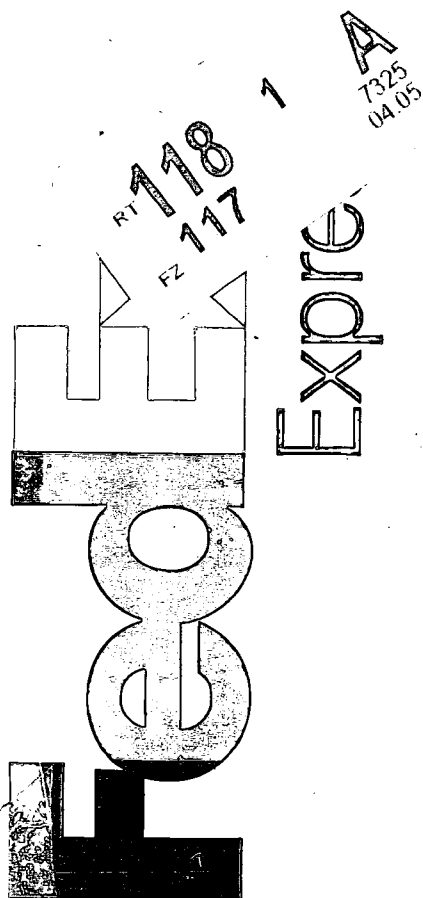
518G1/64BE/33AB

After printing this label:

1. Use the 'Print' button on this page to print your label to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

Warning: Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our Service Guide. Written claims must be filed within strict time limits, see current FedEx Service Guide.



Shipping, Meet Sustainability.

Now, getting it there on time also means getting it there sustainably, because FedEx works with BP Target Neutral to use carbon offsets for every envelope shipment. Of course, the envelope is made from 100% recycled content and is 100% recyclable.

It's part of EarthSmart®—FedEx solutions for a more sustainable world.

Go to **earthsmart.fedex.com** to learn more.



Extremely Urgent

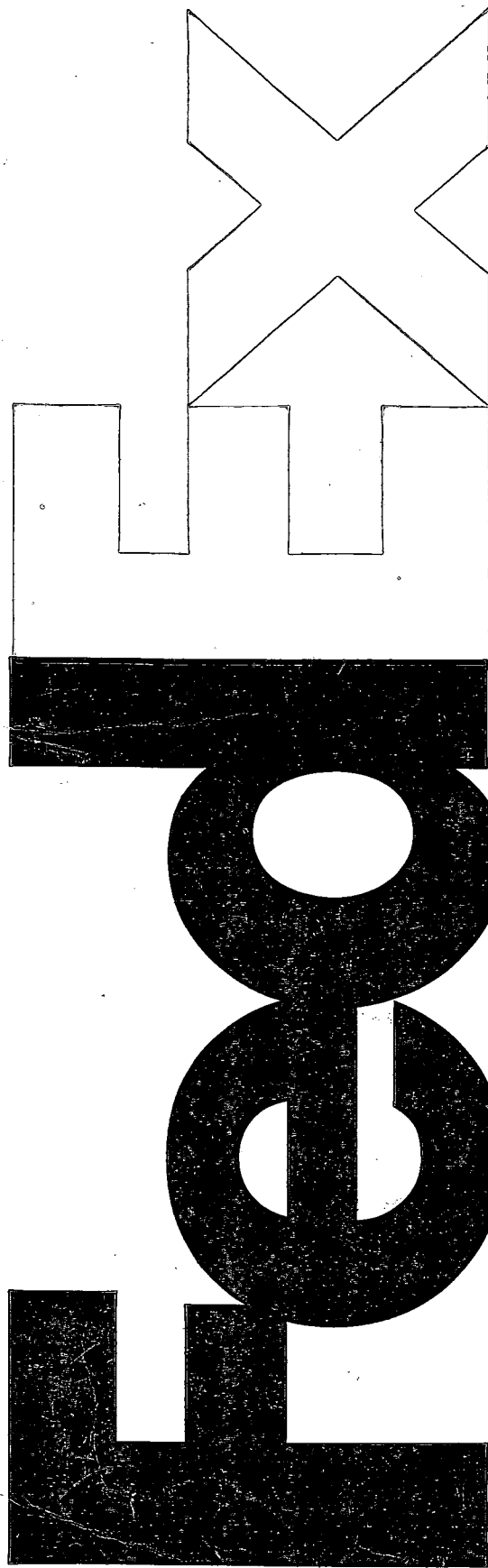
For FedEx Express® Shipments Only

Contents should be compatible with the container and packed securely. For shipping terms and conditions and our limits of liability, refer to the applicable FedEx Express shipping document, the current FedEx Service Guide, or conditions of carriage.

For more information on FedEx Express services, solutions, and shipping locations, go to **fedex.com**, or contact your nearest FedEx location.

© 2012 FedEx 155475/155476 REV 1/12

Insert shipping
document here.



Express



FedEx carbon-neutral
envelope shipping

Align top of FedEx Express® shipping label here.

Envelope

Align bottom of peel and stick airbill here.